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September 1, 2021

Honorable Jerrold N. Poslusny, U.S.B.J.  
U.S. Bankruptcy Court  
P.O. Box 2067  
Camden, NJ 08101-2067  
Sent via e-mail to: chambers\_of\_jnp@njb.uscourts.gov

re: Our Client: Sandra May  
Chapter 13 Case No: 19-27812  
Motion to Sell Real Estate  
Hearing Date: September 7, 2021 at 11:00 A.M.

Dear Judge Poslusny,

As Your Honor is aware, this office represents Sandra May in the Chapter 13 bankruptcy case listed above. We have filed a Motion to Approve the Sale of property in Philadelphia and the motion is scheduled to be heard by Your Honor on September 7, 2021.

Two objections were filed by two secured creditors. One objection was filed by Kyle Eingorn, Esquire on behalf of his client McCormick 105 LLC and this objection has been withdrawn. The second objection has been filed by Christian Del Toro, Esquire on behalf of his client PNC Bank. The objection relates to the fact that PNC Bank has a lien against the property to be sold and must be paid in full at settlement. We believe the proposed form of order, which is the Court's standard order, addresses Mr. Del Toro's objection and by copy of this correspondence we are asking Mr. Del Toro to withdraw his client's objection.

We respectfully request Your Honor consider this matter unopposed.

If Mr. Del Toro's objection is to be considered, I am not available on September 7, 2021 due to the Jewish holiday and ask for the matter to be heard on Thursday or Friday of that week or the following motion day September 14, 2021. Again, we do believe that the proposed order does address Mr. Del Toro's objection.

Thank you for your usual kind consideration

Respectfully yours,

*/s/ Eric J Clayman*

Eric J Clayman

EJC/ks

Cc: Isabel C. Balboa  
Christian Del Toro, Esquire  
Kyle Eingorn, Esquire  
Sandra May